

INTERVENTION



BEFORE THE ARIZONA CORPORATION COMMISSION

WILLIAM A. MUNDELL

Chairman

JIM IRVIN

Commissioner

MARC SPITZER

Commissioner

2001 DEC 20 A 11:46

Arizona Corporation Commission

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AZ CORP COMMISSION
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DEC 20 2001

IN THE MATTER OF ARIZONA PUBLIC SERVICE
COMPANY'S REQUEST FOR A VARIANCE OF
CERTAIN REQUIREMENTS OF A.A.C. R14-2-1000

Docket No. E-01345A-01-0822

PETITION FOR LEAVE TO INTERVENE OF THE LAND AND WATER FUND OF THE ROCKIES

Pursuant to the Rules of Practice and Procedure of the Arizona Corporation Commission ("Commission"), the Land and Water Fund of the Rockies ("LAW Fund") hereby petitions for leave to intervene in the above-captioned docket and, in support thereof, states as follows:

1. The LAW Fund is a regional environmental law and policy center serving the Rocky Mountain states. The LAW Fund has an Arizona board member and individual members who live in Arizona and are electric ratepayers. The LAW Fund's Energy Project promotes the development of clean energy power production technologies, energy efficiency, renewable resources, and other measures that help to minimize the environmental impacts of meeting the demand for energy services in an economically and politically acceptable fashion.

2. The LAW Fund has been involved in proceedings before the Commission for nearly ten years. As part of this work, the LAW Fund has represented a number of other Arizona non-profit organizations interested in energy issues. The LAW Fund has an interest in this proceeding because the requested variance from the competitive bidding requirements may affect the quantity and mix of resources constructed in Arizona and acquired by Arizona utilities, which, in turn, may impact the environment and economy of Arizona and the region.

1 3. Intervention by the LAW Fund will not unduly broaden the issues or delay the
2 proceeding. It is the LAW Fund's understanding that a deadline for intervention has not yet been
3 established for this docket. The LAW Fund agrees to accept the record and procedural schedule
4 as it currently exists. The LAW Fund does not yet know what position it will take in this
5 proceeding.

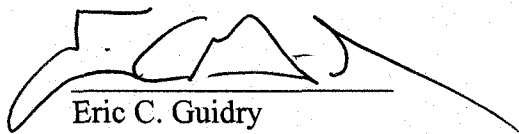
6 4. The LAW Fund requests that all pleadings, correspondence, discovery, and other
7 documents be served on the following:

8 David Berry
9 P.O. Box 1064
10 Scottsdale, AZ 85252-1064
11 480-990-7209 (fax is the same)
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13
14 Eric C. Guidry
15 LAW Fund Energy Project
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21
22 *WHEREFORE*, the LAW Fund respectfully requests that the Commission issue an order
23 granting intervention in the above-captioned proceedings.

24
25 Respectfully submitted this December ¹⁹~~17~~, 2001,

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29 Eric C. Guidry
30 Staff Attorney
31 The Energy Project
32 Land and Water Fund of the Rockies

CERTIFICATE OF SERVICE

I hereby certify that the original and 10 copies of the PETITION FOR LEAVE TO INTERVENE OF THE LAND AND WATER FUND OF THE ROCKIES were FedExed to Docket Control, Arizona Corporation Commission, 1200 W. Washington Street, Phoenix, AZ 85007, on the 19th day of December 2001, and a true and correct copy was sent by U.S. mail, first-class and postage prepaid, to each of the following:

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